

## Letter For Electronic Distribution

Original signed letter on file at the following address:

Nevada Division of Environmental Protection,  
Bureau of Federal Facilities  
333 W. Nye Lane  
Carson City, NV 89706-0851

April 12, 2000

Mr. John Dirickson, P.E.  
Environmental Engineer  
Naval Air Station, Fallon  
Public Works Department  
Environmental Division-Code 187JD  
4755 Pasture Rd.  
Fallon, NV 89496

RE: NDEP Response to Site 18, Southeast Runway Landfill  
Draft Final Decision Document, August 27, 1999, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24  
Remedial Investigation/Feasibility Study  
Naval Air Station Fallon

Dear Mr. Dirickson:

Nevada Division of Environmental Protection (NDEP) staff has reviewed NAS Fallon's Report entitled *Decision Document, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24, Draft Final*, dated August 27, 1999. This report was prepared in response to a series of NDEP letters which commented on NAS Fallon's report entitled *Record of Decision, Sites 4, 5, 7, 8, 9, 10, 11, 15, 17, 18, 19, 23, 24, 25, 26, 27 Naval Air Station Fallon* (ROD), dated June 5, 1998. Due to significant changes between the Draft Final Decision Document and the Record of Decision, the referenced Draft Final Decision Document was reviewed as a draft document instead of a draft final. NDEP's comments on Site 18, Southeast Runway Landfill, are addressed in this letter.

The level of detail and explanation presented in the Draft Final Decision Document does not appear to adequately explain the limited nature of the Remedial Investigation/Feasibility Study (RI/FS) for Site 18. Based on NDEP's review of site conditions and supporting documentation to verify information provided in the Draft Final Decision Document, the NDEP remains concerned that significant data gaps remain. In particular, there appears to be no onsite data collected during the RI/FS, and decisions were mostly based on one remote monitoring well, located approximately 650 feet downgradient of the landfill, which appears to have been sampled once. The limited investigation at Site 18 was based on the assumption that contamination exists within the Site 18 landfill. NAS Fallon now asserts in the Draft Final Decision Document that soil and groundwater at Site 18 are not contaminated. This assertion is inconsistent with the original premise for the limited RI/FS. Also, documentation to verify the location of the landfill does not appear to be included with the administrative record. Due to a lack of data, the nature and extent of contamination and contaminant migration associated with Site 18 cannot be adequately evaluated.

This document needs to be available to the public for review, as appropriate, and an accurate record in the Decision Document is required so that an informed decision can be made. The Decision Document needs to include sufficient information regarding the Site 18 investigation so that the reader who is not familiar with the site can understand that a potential contaminant source at Site 18 was not investigated. The Decision Document needs to state that the investigation of the Site 18 landfill was based on the premise that contamination exists within the Site 18 landfill, and needs to clarify that on-site investigation activities were not implemented to evaluate the nature and extent of contamination. The Decision Document also needs to clarify that the risks to human health and environmental have not been fully evaluated because the nature and extent of contamination remain unknown. These deficiencies need to be addressed in the Decision Document, and are discussed further in the comments attached to this letter.

Formal approval of a "No Further Action" Decision Document is based on the extent of the investigation and remediation, an understanding of the nature and extent of contamination, documentation in the administrative record, and post closure care which includes institutional controls, land use restrictions, and/or post-closure monitoring. The NDEP is concerned that contamination associated with Site 18 could be more extensive than presented in the Draft Final Decision Document. Of considerable concern to the NDEP is that documentation to support the "No Further Action" recommendation in the Draft Final Decision Document does not appear to be included in the administrative record. In a letter dated January 28, 1999, the NDEP requested that supporting documentation (including legible aerial photographs, documentation verifying employee interviews, laboratory analytical reports, and the RI/FS Sampling and Analysis Plan) be provided to the NDEP. However, these documents have not been provided. In consideration of these factors, the NDEP cannot concur with "No Further Action" at this time.

NAS Fallon needs to prepare a proposed plan of action to re-evaluate RI/FS activities for Site 18. The plan of action needs to be submitted to the NDEP for review and concurrence, and needs to address 1) submittal of documentation to locate the landfill, 2) how State landfill closure requirements will be achieved, 3) post-closure monitoring that demonstrates a lack of contaminant migration from Site 18, and 4) contingency plans for site remediation in case if significant groundwater contamination is detected during monitoring. The plan of action also needs to address NDEP's comments on the Draft Final Decision Document for Site 18 which are attached to this letter. NAS Fallon has not responded to many of NDEP's comments presented in the letter dated January 28, 1999. Comments in that letter which were not addressed in the Draft Final Decision Document are reiterated in the comments attached to this letter.

Since many of the issues regarding Site 18 have been on-going and unresolved for an extended period of time, please provide a time frame for addressing the comments in this letter within 30 days. If we as project managers cannot agree on a process to resolve these issues, the NDEP will need to initiate the dispute resolution process. If you have any questions, or need further clarification, please do not hesitate to contact me at (775) 687-4670, extension 3053.

Sincerely,

Jeffrey J. Johnson, P.E.  
Geological Engineer  
Bureau of Federal Facilities

JJJ/js

cc:

Douglas Bonham, NAS Fallon

Commander J. R. Souba, NAS Fallon

Jim Brown, EFA Northwest, Naval Facilities Engineering Command

Mary Kay Faryan, CNRSW

Art Fisher, NAS Fallon

Raj Krishnamoorthy, NAS Fallon

Al Hurt, Deputy, WCIL

Bill Stephens, RAB Community Co-Chair

Paul Liebendorfer, NDEP/BFF

Karen Beckley, NDEP/BFF

Bob Kelso, NDEP/BCA

Jim Lukasko, NDEP/BCA

**COMMENTS ON THE DRAFT FINAL DECISION DOCUMENT  
SITE 18, SOUTHEAST RUNWAY LANDFILL**

1. Page 1, third paragraph: The Draft Final Decision Document states: “*The decision not to undertake a remedial action for this site is consistent with the factors set forth in the National Contingency Plan (NCP) 40 CFR part 300, and Nevada Administrative Code (NAC) Sections 445A.226 through 445A.22755 and 444.570 through 444.7499. This decision was based on one or more of the following*” (three bulleted reasons follow).

The NDEP cannot concur with the above statement for the following reasons:

- C Contamination was assumed to exist at Site 18, but was not investigated or remediated. See comment **7**. Therefore, the statement after the second bullet is inappropriate. Also, the decision not to implement remedial action is not consistent with NAC 445A.226 through 445A.22755.
- C The nature and extent of contamination associated with Site 18 remain unknown due to the fact that no on-site investigation was conducted. The locations and numbers of soil or groundwater samples collected off-site are not adequate to assess contamination migrating from the site. Due to a lack of sampling, the potential exposure of hazardous substances to nearby human populations, animals, and the food chain cannot be evaluated. Therefore, the statement after the first bullet cannot be verified. See comments **7, 8, 10** and **15**.
- C Supporting documentation appears to be missing from the administrative record. See comments **7, 11** and **15**. Therefore, NAS Fallon does not appear to be in full compliance with 40 CFR Part 300, Subpart I: Administrative Record for Selection of Response Action.
- C Site 18, which is a landfill, has not been closed in accordance with NAC 444.570 through 444.7499. NAS Fallon has not responded to NDEP’s comments regarding landfill closure in the letter dated January 28, 1999 (page 6). Due to NAS Fallon’s assumption that contamination exists, and that the nature and extent of contamination is unknown, Site 18 could be considered equivalent to a Class I landfill. NAS Fallon needs to address how Site 18 can be closed in accordance with the regulations. Due to the age of the landfill, the NDEP may waive some landfill closure requirements.

2. Page 1, last paragraph in Section I: The Draft Final Decision Document states: “*The Nevada Division of Environmental Protection (NDEP) has reviewed this document and concurred with this decision. There are not any nationally significant or precedent setting issues for this site.*”

The NDEP has not previously concurred with “No Further Action” for Site 18. Numerous issues which are detailed in the comments in this letter have not been resolved or acceptably supported by documentation. Also, NAS Fallon’s proposal to close Site 18 at this time is not considered acceptable to the NDEP. NAS Fallon needs to prepare a proposed plan of action to re-evaluate RI/FS activities for Site 18.

3. Page 2, Section A, last paragraph: The Draft Final Decision Document states “*The RI Report recommended 14 of the remaining 21 IR Program sites, including Site 18, Southeast Runway Landfill for “no further action”. ... No soil or groundwater contamination was found in relation to the activities at Site 18. Down gradient groundwater test hole indicated no migration of contamination from the landfill*”

The NDEP does not concur with this statement. Based on the 1992 Preliminary Site Characterization (PSC)

Summary, contamination was assumed to exist at Site 18. Also, groundwater test holes cannot be used to evaluate ground water contamination because no groundwater samples were collected and analyzed. The NDEP previously provided comments on these issues in the letter dated January 28, 1999. See comments 7 and 8.

4. Pages 2, Section 1.2 Geology: The Draft Final Decision Document does not address site-specific geological conditions for Site 18. The Decision Document needs to clarify that borings were not drilled at Site 18; therefore, geological conditions at Site 18 remain unknown.

The nearest wells to Site 18 are MW31 and MW32. MW31 is located several hundred feet west (cross gradient) of Site 18, and MW32 is located southeast and downgradient of Site 18 by approximately 650 feet. The RI Report states on page 9-7:

*"The lithologies of these monitoring wells indicate beach and near-shore deposition. The majority of the sediments are poorly graded sands that range in size from fine to coarse grained in a generally fining downward sequence. Interbedded with these sands are minor silty sands, and, in the case of MW32, two moderately sorted sands at 4 ft and 13 ft that are 1 ft thick..."*

This geological description does not appear to be consistent with the geological description provided in the Draft Final Decision Document. Geological descriptions in the Decision Document need to consider data that were collected during the RI/FS. It should also be noted in the Decision Document that the depth to groundwater near Site 18 is approximately 6.5 feet below ground surface.

5. Page 5, Section F, last paragraph: The Draft Final Decision Document states "*The Draft Decision Document for 11 sites including Site 18 will be published in the Lahontan Valley News and the Fallon Eagle Standard. These community participation activities fulfill the requirements of the CERCLA: Section 113(k)(2)(B)(I-v) and 117(a)(2). The Administration Record is available for review at the Churchill County Library.*"

Based on Appendix A in the Draft Final Decision Document (Administrative Record), the documents listed below were not included in the administrative record. These documents should be listed because they contain data, factual information, and analyses that form the basis for the selection of the response action.

- C Progress Reports that included data or interpretations for Site 18.
- C Legible aerial photographs showing the location of Site 18. NDEP correspondence dated May 17, 1994 requested documentation showing the location of the landfill. A copy of an aerial photograph covering the vicinity of Site 18 was provided; however, the photograph was not legible.
- C Documentation verifying employee interviews which point to the location of the landfill in support of NAS Fallon's letter dated July 13, 1994.
- C Laboratory analytical reports.

6. Page 5, Section III. Investigation Summary: The Draft Final Decision Document states "*The Phase II RI for Group III Sites consisted of conducting 8 soil borings, 10 groundwater test borings, 2 monitoring wells, and 1 piezometers. Most of this investigation was conducted to evaluate potential contamination at Site 9.*"

Most of these activities cannot be used to evaluate the nature and extent of contamination at Site 18. Those activities pertinent to Site 18 should be pointed out in this section. For Site 18, no investigation activities were performed onsite during the RI/FS, but one off-site monitoring well was installed approximately 650

feet downgradient of Site 18 (see Navy letter dated January 16, 1996).

7. Page 6, Section A. Vadose Zone and Soil: The Draft Final Decision Document states: *“Soils at Site 18, the Southeast Runway Landfill area were assessed during the investigation at Site 9, Wastewater Treatment Plant. Several ground water test borings were drilled in the area, and a soil sample was collected when drilling MW32. Screening of soils during groundwater test hole drilling indicated no contamination. Also, no contaminants other than laboratory-related contamination were detected in the soil samples taken from monitoring well”*.

The NDEP does not concur with the above statement for the following reasons:

- C No soil samples were collected at Site 18. The nearest soil sample to Site 18 was collected from monitoring well MW32 which was drilled off-site, approximately 650 feet southwest of Site 18. Therefore, the statement *“Soils at Site 18, the Southeast Runway Landfill area were assessed ...”* does not appear to be accurate.
- C The nearest groundwater test holes were drilled west of monitoring well MW32. During drilling, the open hole was monitored for volatile organic compounds (VOCs) with a PID. Screening of soil samples was not performed. Ground water samples were collected and placed into 250-mL vials. The presence of VOC vapors in the head space above the water sample was then qualitatively measured in the field with a portable GC. Contaminant concentrations were not provided for the head space measurements, and groundwater samples were not analyzed. This method may not detect contamination if the contaminant is not a VOC. Due to these methods, data collected from the ground water test holes cannot be used to verify that contamination is not present. This issue was previously discussed in NDEP’s letter dated January 28, 1999.
- C NAS Fallon previously assumed that contamination exists at Site 18. Please review page 116 of the PSC Summary dated January 1992 which states *“Records indicating the type and amount of wastes disposed of at the sites were taken as verification that contamination existed at the sites....It was assumed that some soil contamination existed within the landfill area and the settling ponds. However, characterizing the contents of a landfill or drilling in active settling ponds is an impractical undertaking.”* Data that were collected off-site and indicate no contamination (e.g., data from the ground water test holes and monitoring wells) cannot be used to justify that no contamination exists at Site 18. This issue was previously discussed in NDEP’s letter dated January 28, 1999.
- C The location of Site 18 has not been confirmed. Therefore, the adequacy of the locations of soil and groundwater samples cannot be confirmed. In the letter dated January 28, 1999, the NDEP requested the following supporting documentation which could be used to locate Site 18:
  - a. Legible aerial photographs showing the location of Site 18. NDEP correspondence dated May 17, 1994 previously requested documentation showing the location of the landfill. A copy of an aerial photograph covering the vicinity of Site 18 was provided; however, the photograph was not legible.
  - b. Documentation verifying employee interviews which point to the location of the landfill in support of NAS Fallon’s letter dated July 13, 1994.

The NDEP has not yet received a response regarding the supporting documentation described above. This documentation needs to be provided if the closure of Site 18 is to be based on information presented in the documents.

8. Page 6, Section B, Groundwater, first paragraph: The Draft Final Decision Document states “*Levels of contamination for all the samples from MW31 were reported as “no compounds detected”. Toluene was reported at a concentration of 2 ppb in MW32. Thus, there is no substantial groundwater contamination associated with the site.*”

One groundwater sample was collected in April 1991 from each of the two monitoring wells described above. MW31 is located several hundred feet west (cross gradient) of Site 18. MW32 is located southeast and downgradient of Site 18 by approximately 650 feet (see Navy letter dated January 16, 1996). One groundwater sampling event from these wells does not confirm the lack of contaminated groundwater associated with Site 18 and does not establish a trend to base any decision on, given the fact that contamination was assumed to exist within the landfill. Furthermore, the distance between Site 18 and the downgradient monitoring well (MW32) is excessive. The NDEP remains concerned that Site 18 may be a source for groundwater contamination. Thus, the NDEP cannot concur at this time with the statement “*there is no substantial groundwater contamination associated with the site.*”

In correspondence dated February 27, 1996, the NDEP requested that the fate and transport evaluations presented in NAS Fallon’s letter dated January 16, 1996 be included in the Decision Document. The NDEP also requested that the probability of any buried drums of waste leaking their contents at a future date be discussed. This information needs to be included in the Decision Document. Fate and transport evaluations must be backed up with appropriate calculations. If computer models are used to support the conclusions, then all assumptions used in the model need to be provided. If fluvial channels are assumed not to be continuous, then documentation supporting this assumption needs to be provided (e.g. cross sections, lithofacies maps, etc.).

9. Page 6, Section B, Groundwater, second paragraph: The Draft Final Decision Document states “*Bail tests from MW31 and MW32 resulted in hydraulic conductivity of 0.2 and 0.6 ft/day respectively. Combining the groundwater gradient of 0.0017 ft across the sites and assuming a porosity of 33% results in calculated groundwater velocities of 0.5 and 1.1 ft/year respectively.*”

This statement was copied from the draft Decision Document dated November 1995. The hydraulic conductivity range cited above does not accurately represent the values cited in Table E-20 in Volume II of the RI Report. More importantly, NAS Fallon needs to review NDEP’s comments for Site 9 provided in a letter dated March 5, 1996. NDEP states on page 5 “*In enclosure 2 of Steve Iselin’s letter of January 16, 1996, a ground water velocity of 39 ft/yr, based on pump test data collected at Site 16, was estimated for the Site 9/MW32 area. Please use the most reliable estimate for ground water velocity at the site.*” The most representative hydraulic conductivity value for Site 18 needs to be included in the Decision Document. The hydraulic conductivity at MW32 is important information because the Lower Diagonal Drain is located just to the south where off-base migration of contaminants may occur.

The Draft Final Decision Document for Site 4 discusses hydraulic conductivities from both bail tests and aquifer tests, and the Decision Document for Site 18 needs to have the same discussion. Bail tests provide qualitative hydraulic conductivity data, and are less reliable than hydraulic conductivity data collected from pumping tests. At NAS Fallon, bail tests have generally underestimated hydraulic conductivities. The RI report states on page E-16 “*The results of the pumping tests indicate K values 5 to 125 times higher than the bail-test values. The bail-test data are considered strictly qualitative and yield a relative number for each location*”. As stated on page 8 of the Draft Final Decision Document for Site 4, bail tests can yield hydraulic conductivities lower than the aquifer due to the “skin effect” which may also be more characteristic of the sand pack placed in the well instead of the aquifer.

Soil properties for samples collected from MW31 and MW32 can also be used to assess hydraulic conductivities. The RI Report states on page 9-7 that the majority of the sediments in monitoring wells MW31 and MW32 range in size from fine to coarse grained. Based on Table E.5 in Appendix II of the RI Report, an average hydraulic conductivity for this type of soil is 42.63 feet/day. This is significantly higher than hydraulic conductivities based on the bail tests.

10. Page 6, Section C, Risk Assessment Summary: The Draft Final Decision Document states “*A quantitative risk assessment at Site 18 for soil and groundwater was not conducted due to the absence of contamination.*”

NAS Fallon has assumed that contamination exists at the landfill (see comment 7). Therefore, the above statement is not considered appropriate. The Decision Document should state that a risk assessment for Site 18 could not be performed because no soil or groundwater samples were collected onsite.

11. Page 6, Section D, Conclusion: The Draft Final Decision Document states “*No soil contamination was detected at Site 18. MW32 and groundwater test borings screening down gradient from the landfill indicated no migration of contaminants. Also no new material has been introduced to the landfill for nearly 50 years, it is highly unlikely that any future migration of contaminants will occur. Therefore, there is no health risk associated with exposure to contaminants at Site 18.*”

The NDEP does not concur with the above statement. See comments 7, 8 and 10. Without an adequate investigation, the nature and extent of contamination, the potential for contaminants to migrate, and health risks associated with Site 18 cannot be assessed.

12. Page 6, Section IV, Proposed Action: The Draft Final Decision Document states “*The site is recommended for NO FURTHER ACTION. The soil and groundwater at Group III, Site 18 is not contaminated. No risk assessment was necessary. The site is not considered a potential human health or ecological risk.*”

The NDEP cannot concur with “No Further Action” for Site 18 at this time, or the last two sentences in the above statement, for the reasons stated throughout this letter.

Draft Final Decision Documents prepared for most of the other IRP sites referenced NDEP’s letters dated May 17, 1994 and August 21, 1997 to justify “No Further Action”. These letters were not referenced for Site 18. NDEP comments in these letters regarding Site 18 are presented below for completeness.

C NDEP’s letter dated May 17, 1994 states “*The exact location of the landfill must be confirmed to ensure that groundwater monitoring wells are properly located. Please include copies of aerial photographs, that show the landfill location, in the final RI Report. Final cover and closure requirements will depend on the results of groundwater samples collected from properly placed monitoring wells.*”

C NDEP’s letter dated August 21, 1997 states “*Land use restrictions must be placed in base real estate and planning documents prior to closure.*”

Based on the administrative record, the location of the landfill remains questionable, and the extent of soil and groundwater contamination associated with the landfill remain unknown. NAS Fallon needs to prepare a proposed plan of action to re-evaluate RI/FS activities for Site 18. The plan of action needs to be submitted to the NDEP for review. See comment 13 below.



13. Page 7, Section V, Future Activity at Site 18: NAS Fallon stated that administrative controls will be imposed on Site 18. However, a latitude and longitude were not provided in the Draft Final Decision Document for Site 18 because the location of the landfill is uncertain. The NDEP requests additional information regarding how NAS Fallon will impose administrative controls on a landfill whose location is uncertain. Please be advised that administrative controls are subject to future audit.

Because RI/FS work at Site 18 was based on the premise that contamination exists, closure of Site 18 cannot be based on analytical results for a single groundwater sampling event that indicates no contamination. Analytical results for a single groundwater sampling event do not provide a trend to base a decision on. Closure must be based on demonstrating a lack of contaminant migration based on analytical results for samples collected during several sampling events. Investigation results presented to the NDEP thus far do not appear to accomplish this goal. Also, because contamination exists in the landfill at Site 18, and remediation of contaminated soil may not be required, closure of Site 18 must be consistent with NAC 445A.22745. Groundwater sampling needs to address changes in groundwater quality that occur during the course of the year as hydrogeological conditions change, and a sufficient number of groundwater samples need to be collected to justify closure.

As stated in comment **12** above, NAS Fallon needs to prepare a proposed plan of action to re-evaluate RI/FS activities for Site 18. The plan of action needs to be submitted to the NDEP for review and needs to include the following elements:

- C Submittal of documentation to locate the landfill.
- C How State landfill closure requirements will be achieved. (Due to the age of the landfill, some closure requirements may be waived).
- C Post-closure monitoring that demonstrates a lack of contaminant migration from Site 18. Please note that NAC 444.6984(c) and NAC 444.7483(1)(b) require that ground water samples represent the quality of groundwater at the boundary of a waste management unit. Therefore, additional monitoring wells need to be installed adjacent to the landfill.
- C Contingency plans for site remediation in case if significant groundwater contamination is detected during monitoring (see NDEP letters dated September 25, 1995 and August 21, 1997).

Post-closure monitoring requirements and associated long-term costs can be reduced or eliminated if additional characterization work is completed to evaluate the nature and extent of soil and groundwater contamination associated with Site 18.

14. Page 7, Section VI, Recommendations: The Draft Final Decision Document states “*This Decision Document represents the selection of a no action alternative and subsequent closure for Site 18 at NAS Fallon, Fallon, Nevada. The no action alternative was developed in accordance with CERCLA as amended and is consistent with the NCP. This decision is supported by the documents in the administrative record for the site.*”

The NDEP does not concur with “No Further Action” for Site 18 for the reasons stated in this letter. The NDEP also does not concur with the last two sentences in the above quote. Please review comment **13** for additional work that needs to be completed.

15. NAS Fallon needs to address all comments in NDEP’s January 28, 1999 letter for Site 18. Comments

which need to be addressed, but have not been completely discussed above include the following:

Item 3 in NDEP's January 28, 1999 letter

Information or data that are used to support the "No Further Action" recommendation must be backed up with supporting documentation. Documentation does not need to be provided with the Decision Document, but needs to be present in NDEP's files. Supporting documentation for Site 18 missing from the NDEP files are listed below.

- C Legible aerial photographs showing the location of Site 18. NDEP correspondence dated May 17, 1994 previously requested documentation showing the location of the landfill. A copy of an aerial photograph covering the vicinity of Site 18 was provided; however, the photograph is not legible.
- C Documentation verifying employee interviews which point to the location of the landfill in support of NAS Fallon's letter dated July 13, 1994.
- C Laboratory analytical reports.
- C Sampling and Analysis Plan for the RI/FS (Volume III of the RI/FS Work Plan).

NAS Fallon needs to provide the supporting documentation, or state the supporting documentation does not exist and is not included in the Administrative Record.

NDEP requested that metal concentrations in soil and groundwater at Site 18 be compared with background metal concentrations, and that a drawing which shows where the background samples were collected be provided. The Draft Final Decision Document responds by stating on page C-16 "*Comparison of metal concentrations to background metal concentrations will not be provided since metals are not the contaminants of concern at the site.*" This statement is not considered to be an appropriate response. Metals are contaminants of concern. The RI Report states on page 9-4 "*It is estimated that as many as 18,000 tons of material were landfilled in this area. Suspected contaminants include paints, metals and PHCs.*" The PA/SI Report recommended on page 3-7 that priority pollutant metals be analyzed in samples collected from Site 18. During the RI/FS, 16 soil samples and 2 groundwater samples from the Group III Sites (Sites 9 and 18) were analyzed for metals. The RI Report concludes on Page 9-10 "*None of the soil borings associated with the two grit disposal pits contained concentrations of metals higher than levels noted at other sites.*" The RI Report doesn't address metals in groundwater, doesn't describe what "*levels noted at other sites*" is, and doesn't compare metal concentrations to the ARARs. The Decision Document needs to address these issues and explain why metals are no longer considered contaminants of concern. Metal concentrations need to be compared to the ARARs and/or background concentrations.

Tables showing analytical results for soil and groundwater samples must be included in the Decision Document.

16. Appendix C, page C-17, first paragraph: The Draft Final Decision Document states "*Groundwater investigation resulted in no significant contamination; only toluene was reported at 2 ppb in MW32. Groundwater dissolved phase plume is related to Site 16 and will be remediated as part of Site 16 remedial action.*"

The distance between MW32 and Site 16 is approximately 3,300 feet. If NAS Fallon leaves the above statement in the Decision Document, then justification needs to be provided to explain how remediation of contaminated groundwater at MW32 will be accomplished with remediation for the Site 16 contaminant plume. NAS Fallon should also explain how contaminated groundwater from Site 16 could be present at MW32, but not be present upgradient of Site 18.